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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	MM Docket No. _____
Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations		RM-_____
(Antlers, Oklahoma)	)	

To: Chief, Allocations Branch

SUPPLEMENT TO PETITION FOR RULEMAKING

Keystone Broadcasting Corporation ("Keystone"), by its attorneys, hereby supplements its Petition for Rulemaking filed on **January** 23,2002 seeking modification of the allocation of Channel 272A to Antlers, Oklahoma. In particular, Keystone's Petition requests modification of the reference point of Channel 272A to eliminate severe short-spacing between the Channel 272A allocation and Keystone's Station KHKC-FM, Atoka, Oklahoma. As shown in the Petition, this modification would allow for significantly enhanced service by KHKC-FM to Atoka, its community of license.[1/]

The purpose of this supplemental filing is to provide the Commission with further assurance that a station operating on Channel 272A from the modified reference coordinates would provide city-grade coverage over the entire community of Antlers and, indeed, well beyond its city limits. Exhibit E-2 to the initial January 2002 Engineering Statement attached to the Petition as Exhibit A is a map depicting the 3.16 mV/m contour of a station using maximum Class A FM facilities (6kw/100 meters HAAT) operating from the Channel 272A allotment site proposed in the Petition. The map shows that the 3.16 mV/m contour covers Antlers but, with

1/ Keystone filed a minor modification application for Station KHKC-FM on January 11,2002 specifying modified facilities (BPH-20020111AAI) to provide for such improved service. **A** copy of that application was submitted with the Petition as Exhibit B.

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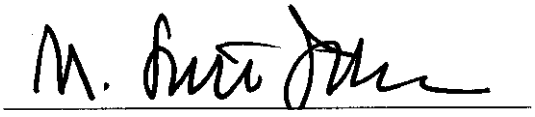
the fully-spaced allotment site being located roughly 15 kilometers to the east of Antlers, the depicted 3.16 mv/m contour appears to fall near to the western edge of the Antlers city limits.

Attached hereto is a supplemental Engineering Statement prepared by Cohen, Dippell and Everist, P.C., Consulting Engineers. The Engineering Statement provides additional analyses of the signal level from the Channel 272A allotment site in the direction of Antlers using two methods. Both methods confirm complete city grade coverage of Antlers. Thus, using the FCC's Point-to-Point Model, the attached Engineering Statement shows that the predicted 70 dbu contour extends some 30 km from the modified reference coordinates site in the direction of Antlers, placing it more than 15 km beyond the westemmost boundary of that community. See attached Engineering Statement, Exhibit 1. Likewise, using NTIA's Rice-Longley Model also results in a predicted 70 dbu contour extending well beyond Antlers. See attached Engineering Statement, Exhibit 2. Finally, an analysis of the terrain profile data in the direction of Antlers from the Channel 272A modified reference coordinates indicates that line-of-sight transmission is achieved to Antlers from the modified reference coordinates site. See attached Engineering Statement, p. 1.

Respectfully submitted,

KEYSTONE BROADCASTING CORPORATION

By: 

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April 22, 2003

Its Attorneys

DC01/39620 1.1

Engineering Statement

ENGINEERING STATEMENT
SUPPLEMENTAL TNFORMATION FOR
ALLOTMENT FOR ANTLERS, OKLAHOMA
CHANNEL 272A 6 KW 100 METERS HAAT

APRIL 2003

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington)
) SS
District of Columbia)

Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Enginesr In the District of Columbia, and is President, Secretary and Treasurer of Cohen, Dippell and Evwist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 C Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

Donald G. Everist
District of Columbia
Professional Engineer
Registration No. 5714

Subscribed and sworn ta before me this 18th day of April, 2003.

Notary Public

My Commission Expires: 2/28/2008

This engineering statement has been prepared on behalf of Keystone Broadcasting Corporation and provides supplemental information in support of its request for a proposed rule making to modify the reference coordinates of the unused 272A (102.3 MHz) allotment of Antlers, Oklahoma, in Section 73.202(b) of the FCC Rules. The attached engineering information demonstrates compliance that a 70 dBu or greater signal level is predicted ta serve the community of Antlers.

The analysis of the profile data in the direction of Antlers from the proposed site finds that line-of-sight transmission is achieved to Antlers.

An analysis of the signal level in the direction has been performed using the FCC point-to-point[1] analysis method located on the FCC's web site and using NTIA's Longley-Rice model, The FCC's point-to-point FM model ("PTP") is a radio propagation model. The NTIA's Longley-Rice model is a point-to-point irregular terrain model (Longley-Rice ITM).

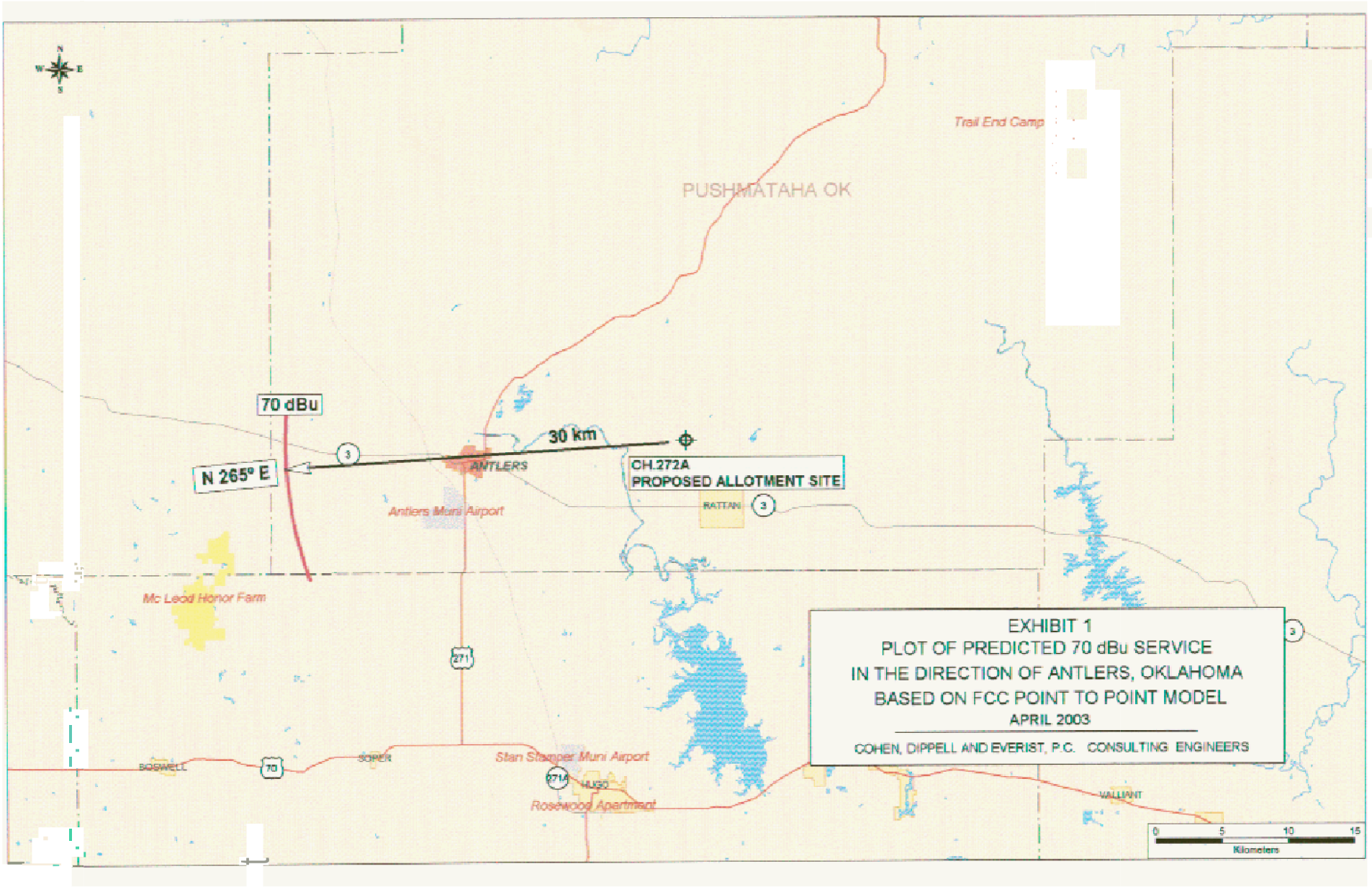
Results of this analysis is provided on two exhibits, Exhibits 1 and 2. Exhibit 1 provides the relationship of the proposed transmitter sire, the community of htlers, and the location of the 70 dBu contour using the FCC's PTP analysis model. As shown the 70 dBu contourin the direction of Antlers extends well beyond the community of htlers.

Exhibit 2 provides the resultsofthe signal level determined from the NTIA Longley-Rice ITM from the proposed facilities, As shown greater than 70 dBu service is determined to extend well beyond the community of Antlers.

[1] Point-to-Point FM model.

Conclusion

Two alternate propagation models, FCC PTP and the NTIA Longley-Rice, determine that greater than 70 dBu service over the community of Antlers and surrounding areas is provided.


70 dBu
N 265° E
30 km
ANTLERS
CH.272A
PROPOSED ALLOTMENT SITE
RATTAN
Antlers Muni Airport
Trail End Camp
PUSHMATAHA OK
Mc Leod Honor Farm
BOSWELL
SOPER
Stan Stamper Muni Airport
HUGO
Rosewood Apartment
VALLIANT
EXHIBIT 1
PLOT OF PREDICTED 70 dBu SERVICE
IN THE DIRECTION OF ANTLERS, OKLAHOMA
BASED ON FCC POINT TO POINT MODEL
APRIL 2003
COHEN, DIPPELL AND EVERIST, P.C. CONSULTING ENGINEERS
0 5 10 15
Kilometers

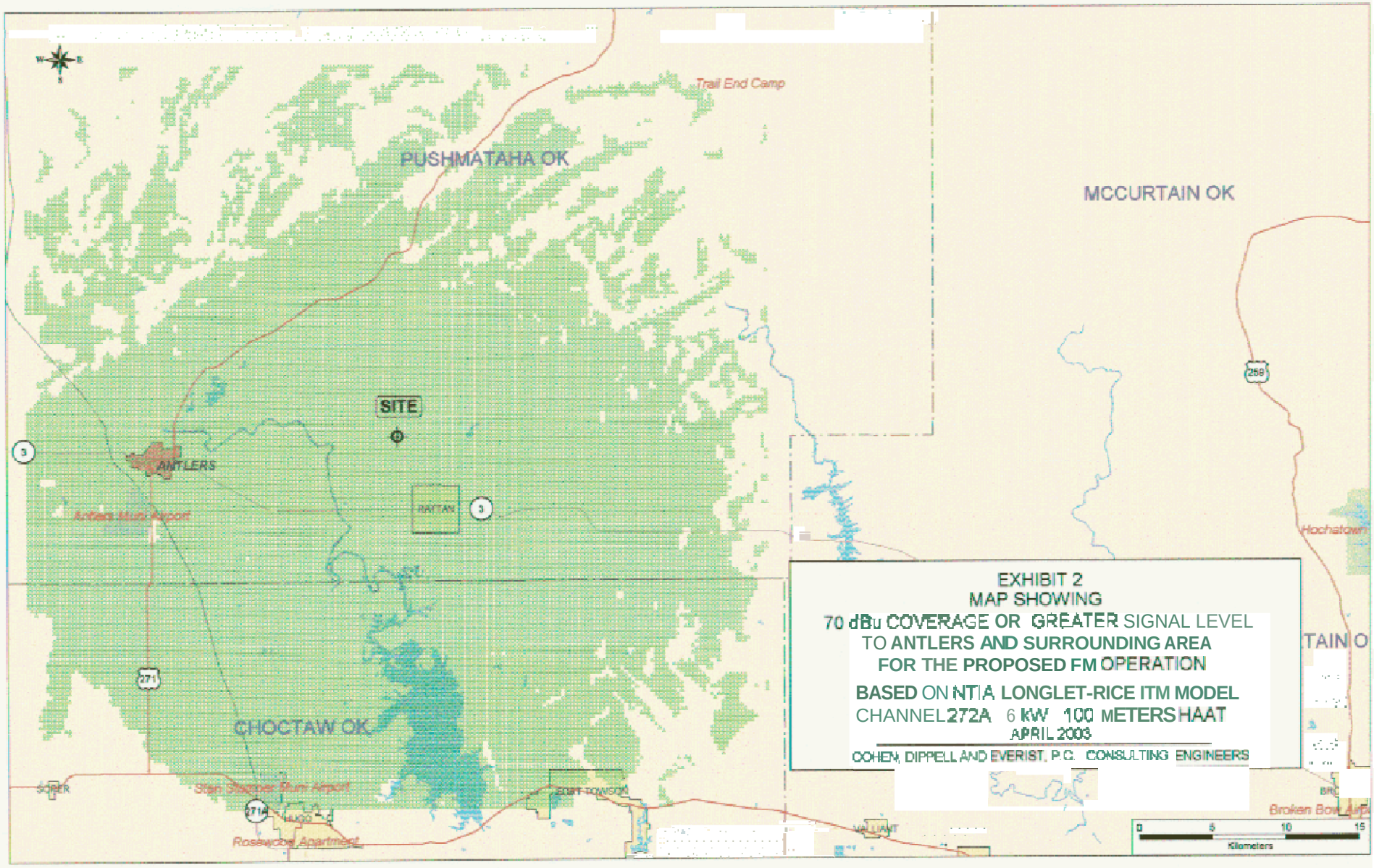


EXHIBIT 2
MAP SHOWING
70 dBu COVERAGE OR GREATER SIGNAL LEVEL
TO ANTLERS AND SURROUNDING AREA
FOR THE PROPOSED FM OPERATION
BASED ON NTIA LONGLET-RICE ITM MODEL
CHANNEL 272A 6 kW 100 METERS HAAT
APRIL 2003
COHEN, DIPPELL AND EVERIST, P.C. CONSULTING ENGINEERS